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October 25, 2024

Via Electronic Filing

The Hon. Lewis J. Liman U.S.D J.
U.S. District Court, Southern District of New York
500 Pearl Street, Courtroom 15C
New York, NY 10007

Re: *Kamilah Jolly, Diego Alvarez-Miranda Ezpeleta, individually and on behalf of all others similarly situated v. FurtherEd, Inc. d/b/a Lawline*
Case No.: 1:24-cv-06401-LJL

Dear Honorable Judge Liman:

This law firm represents Defendant FurtherEd, Inc. d/b/a Lawline (“Defendant”) in the above-referenced consolidated matter.

Pursuant to Your Honor’s Individual Motion Practice Rule 1, this letter respectfully serves to request an extension of Defendant’s time to reply or otherwise respond to Plaintiff’s Complaint to, 30 days after Plaintiffs’ filing of the First Amended Complaint.

This request is made on consent of counsel for Plaintiffs and the Putative Class. If granted, this request would not affect any other scheduled deadlines, as there are no hearings currently on calendar.

The basis of this request is that on October 17, 2024, the court granted Plaintiffs’ Motion to Consolidate case number 1:24-cv-06401-LJL (*Jolly v. Lawline*) and case number 1:24-cv-06709-LJL (*Ezpeleta v. Lawline*). Plaintiffs’ counsel has indicated that they will be filing a First Amended Complaint to harmonize the two consolidated actions into one complaint. Postponing the current response deadline until 30 days after the filing of the First Amended Complaint would promote judicial efficiency and conserve the resources of all parties.

In light of the foregoing, it is respectfully requested that the Court extend Defendants’ time to reply or otherwise respond to Plaintiff’s Complaint from October 30, 2024 to 30 days after Plaintiffs’ filing of the First Amended Complaint.

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Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

MINTZ LEVIN COHN FERRIS GLOVSKY AND
POPEO, P.C.

By: /s/ Erin E. Galliher

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Attorneys for Defendant

** Pro Hac Vice Application Forthcoming*

VIA ECF: All Counsel